

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

**(1) COREY NORRIS,
a/k/a “Case,” “Jacorey Johnson,”**

Defendant

Crim. No. 13-CR-10077-DJC

GOVERNMENT’S SENTENCING MEMORANDUM

On September 29, 2015, Corey Norris pleaded guilty to Counts 1, 14, 15, 16, and 17 of the Third Superseding Indictment. Count 1 charged Norris with involvement in a multi-year multi-state sex trafficking conspiracy with, among others, co-defendant Raymond Jeffreys. Counts 14 and 15 charged Norris with the sex trafficking of a 17-year old girl in October to November 2011. Counts 16 and 17 charged Norris with the sex trafficking of a different girl, also 17 at the time of the offense, in December 2012. The Government described both the conspiracy and these two sets of specific conduct at the plea hearing, and Norris agreed generally with the offense conduct. The court found a factual basis for Norris’s plea and deferred acceptance of the plea until sentencing. (Docket No. 486). The United States Probation office correctly describes the conduct in specific detail in the Pre-Sentence Report (“PSR”), dated December 31, 2015. The PSR calculates the Total Offense Level based on this conduct at 37 (PSR ¶ 66), which is the same calculation agreed on by the parties in the Plea Agreement (Docket No. 485).

Based on Norris’s criminal history, the United States Probation office calculates that he is

Criminal History Category V, and that his resulting Guidelines Sentencing Range (GSR) is 324-405 months. The Government defers to the U.S. Probation office's calculation of the GSR. However, Norris persuasively argues in his sentencing memorandum, *inter alia*, that even if the GSR calculation is correct as a technical matter, the Criminal History Category overstates his prior conduct in part because of his youth at the time of the offenses. (Docket No. 531.) Norris also faces a 15 year mandatory minimum sentence on Count 16, and a 10 year mandatory minimum sentence on Counts 14 and 17.

For reasons to be discussed in more detail at the defendant's sentencing hearing, the Government recommends that the Court impose a sentence of 180 months. This sentence reflects the agreed-upon recommendation set forth in the defendant's plea agreement, after extensive discussion. It balances the defendant's personal characteristics, the seriousness of the offense, the need for specific deterrence, and the need to protect the public. It is a sentence which is sufficient, but not greater than necessary, to achieve the goals of sentencing. See 18 U.S.C. §3553(a). The government respectfully requests that the Court adopt the joint recommendation of the parties.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Amy Harman Burkart
AMY HARMAN BURKART
DAVID J. D'ADDIO
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I certify that this document was filed on the date listed below through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Amy Harman Burkart
AMY HARMAN BURKART
Assistant United States Attorney

Dated: January 12, 2016